

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERTO ALMODOVAR, JR.)	
)	Case No. 18 CV 2341
Plaintiff,)	
)	Judge Joan B. Gottschall
)	
vs.)	
)	
)	
REYNALDO GUEVARA, et al.)	
)	
Defendants.)	

WILLIAM NEGRON)	
)	Case No. 18 CV 2701
Plaintiff,)	
)	Judge Joan B. Gottschall
)	
vs.)	
)	
)	
REYNALDO GUEVARA, et al.)	
)	
Defendants.)	

**DEFENDANT OLSZEWSKI'S UNOPPOSED MOTION FOR LEAVE TO FILE
AN OVERSIZED MEMORANDUM, PURSUANT TO LOCAL RULE 7.1, *INSTANTER***

Defendant Mark Olszewski, by his attorneys, The Sotos Law Firm, P.C., hereby moves this Honorable Court for entry of an order granting him leave to file an oversized Memorandum of Law in Support of his Motion for Summary Judgment in excess of fifteen pages, seeking an additional eight pages pursuant to Local Rule 7.1. In support of his motion, Defendant states as follows:

1. Plaintiffs Roberto Almodovar, Jr., and William Negron have each respectively filed eleven-count Complaints against Defendants City of Chicago and four of its former police

officers, including Defendant Olszewski, pursuant to 42 U.S.C. § 1983 and Illinois law, alleging that they were wrongfully convicted of the crimes of murder and attempted murder.

2. Defendant Olszewski's deadline to file his motion for summary judgment is December 21, 2022. (Dkt. 199.) Defendant Olszewski has prepared a memorandum in support of his motion for summary judgment (attached hereto as Exhibit A), which states that the undisputed material facts demonstrate that all of Plaintiffs' claims fail as a matter of law.

3. The undersigned has reviewed and edited the Memorandum of Law in an attempt to eliminate any redundant or unnecessary facts and arguments. Notwithstanding that effort, given the age and complexity of this case, the number of parties, the issues presented, and the voluminous evidentiary record, additional pages are necessary to adequately address all of Plaintiff Almodovar's and Plaintiff Negron's claims. Defendant Olszewski's Memorandum of Law in Support of his Motion for Summary Judgment exceeds the fifteen-page limit set by Local Rule 7.1 by eight pages, for a total of 23 pages.

4. This motion is not brought for the purposes of harassment or undue burden.

5. Additionally, on December 19, 2022, the undersigned conferred with Counsel for Plaintiffs, who had no objection to this motion.

6. Accordingly, Defendant Olszewski respectfully requests that this Court grant this motion and grant him leave to file a memorandum of law of 23 pages.

WHEREFORE, Defendants pray that this Honorable Court enter an order granting them leave to file their Memorandum with an additional eight pages, pursuant to Local Rule 7.1, *instantly*.

Date: December 21, 2022

Respectfully submitted,

/s/ Josh M. Engquist

JOSH M. ENGQUIST, Atty No. 6242849

Special Assistant Corporation Counsel

One of the Attorneys for Individual Defendants

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury pursuant to 28 U.S.C.A. § 1746 that the foregoing is true and correct, and that on Wednesday, December 21, 2022, I electronically filed the foregoing **Defendant Mark Olszewski' Unopposed Motion for Leave to File an Oversized Memorandum, Pursuant to Local Rule 7.1, *Instante*** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants listed on the below Service List:

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